

REMARKS

Claims **1-24** and **33-38** are pending in the application.

Claims **1-24** and **33-38** have been rejected.

Claims **1, 9** and **33** have been amended. No new matter is added.

No claims have been **cancelled or added**.

Support for the claim amendments can be found throughout the present Patent Application and the Provisional Patent Application No. 60/457,271 filed March 24, 2003 (the “Provisional Application”) from which the current Application claims priority (as well as incorporates the Provisional Application by reference). For example, support for the claim amendments can be found at least on pages 20 and 21 and Fig. 9 of the Provisional Application, as well as at other points in the present Patent Application, such Figs. 3A and 3B and their corresponding description, among others.

Interview Summary

On October 12, 2011, a Telephone Interview was conducted between Examiner Fahd A. Obeid, and Applicants’ representative Martin R. Wojcik (Reg. No. 57,577). During this interview, Applicants’ representative and Examiner Obeid discussed cited art and proposed amendments to claim 1. Applicants have amended the claims in light of this Interview. Applicants’ representative would like to thank the Examiner for the helpful and productive Interview.

Rejection of Claims under 35 U.S.C. §112

Claims 1-24 and 33-38 are rejected under 35 U.S.C. 112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Applicants have amended the claims to address Examiner’s concerns. For example, the “record” element of the independent claims 1, 9, and 33 is clarified by the current amendments, e.g., to recite an “intermediate record.” As such, independent claims 1, 9, and 33, and claims dependant thereon, are now definite. In view of this, Applicants respectfully request that the rejection of claims 1-24 and 33-38 under 35 U.S.C. § 112 be reconsidered and withdrawn.

Rejection of Claims under 35 U.S.C. § 103

Claims 1-24 and 33-36 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,708,828 (“Coleman”) in view of U. S. Patent No. 5,446, 880 (“Balgeman”), and further in view of U.S. Patent Publication No. 2002/0178077 (“Katz”). Applicants respectfully traverse this rejection.

Applicants respectfully submit that Coleman, Balgeman, and Katz, alone or in any rational combination, fail to teach or suggest the elements of claim 1, particularly as claim 1 has been amended, including:

generating intermediate source inventory location information by
converting the source inventory location information into an
intermediate format, wherein
the converting the source inventory location information into the
intermediate format comprises
determining whether an intermediate record exists, wherein
the intermediate record is associated with the source
inventory location information,
if the intermediate record exists, accessing a common
object, wherein
the common object is associated with the
intermediate record,
if the intermediate record does not exist, creating the
intermediate record and the common object, and
mapping the source inventory location information to the
common object, and
after the converting, the common object comprises the
intermediate source inventory location information

Coleman relates to a data conversion system which converts data between different software and hardware platforms. *Coleman*, Abstract. Coleman, in general terms, discusses aspects related to a data conversion language/engine (DCLE), which converts data from different types of data to a data standard having a pre-defined generic data type, and then converts from this generic data type to a new desired data type and stores the result on a destination platform. *Coleman*, 2:44-54.

However, insofar as Applicants are able to discern, Coleman does not teach or suggest any concepts comparable to converting source inventory location information into an intermediate format, particularly where such converting includes determining the existence of an intermediate record that is associated with the source inventory location information. This being the case, Coleman, must, by definition, also fail to teach or

suggest, if such an intermediate record exist, accessing a common object, wherein the common object is associated with the intermediate record. In fact, Coleman does not teach or suggest the claimed intermediate record or the claimed common object, especially a common object that is associated with the intermediate record.

Coleman thus must also fail to teach or suggest, if such an intermediate record does not exist therein, creating the intermediate record and the common object, where the common object includes the source inventory location information in the intermediate format, all as recited in claim 1. Furthermore, Applicants also respectfully submit that Coleman does not teach or suggest mapping the source inventory location information to the common object, if for no other reason that such common object is not taught or suggested by Coleman. Applicants therefore respectfully submit that Coleman fails to teach or suggest at least these features of claim 1, among others.

Balgeman does not remedy the deficiencies of Coleman. Balgeman, in general terms, discusses aspects of a database interface that provides a translation from a record format of a given database to a standardized format for transmission to other nodes, thus providing translation between different databases formats. *Balgeman*, Abstract. In Balgeman, subsequent updates of a record by any node are automatically distributed to the other nodes by utilizing a standardized record format. *Balgeman*, 8:51-60. However, insofar as Applicants are able to discern, Balgeman fails to show, teach or suggest any concept even remotely comparable to the elements of claim 1 reproduced above. Applicants therefore respectfully submit that Balgeman, taken alone or in any rational combination with Coleman (which also fails to teach these features), also fails to show, teach, or suggest at least these features of claim 1, among others.

Katz also fails to remedy these deficiencies. Insofar as Applicants are able to discern, Katz also fails to show, teach or suggest any concept even remotely comparable to the elements of claim 1 reproduced above. Applicants therefore respectfully submit that Katz, taken alone or in any rational combination with Coleman and/or Balgeman (which also fail to teach these features), also fails to show, teach, or suggest at least these features of claim 1, among others.

In summary, since the combination of Coleman, Balgeman, and Katz does not teach or suggest each and every feature of claim 1, the combination of Coleman, Balgeman, and Katz cannot render claim 1 obvious. Furthermore, independent claims 9 and 33 are patentable over Coleman, Balgeman, and Katz for similar reasons to

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independent claim 1, and further in view of their own features. Still further, claims 2-8, which depends from independent claim 1, claims 10-24, which depend from independent claim 9, and claims 34-36, which depend from independent claim 33, are patentable over Coleman, Balgeman, and Katz for at least the reasons provided for their respective base independent claims, and further in view of their own features. Accordingly, Applicants respectfully request that the rejection of claims 1-24 and 33-36 under 35 U.S.C. § 103(a) be reconsidered and withdrawn.

CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. Applicant also hereby authorizes that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,

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